

Remarks

Claims 1-9 and 11-30 are currently pending in the application. Claims 1, 16 and 25 are independent claims. All currently pending claims have been rejected.

Claims 1-5, 7-9, 11-23 and 25-27 have been rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Published Patent Application No. 2003/0120571 ("Blagg").

The Examiner states that all of the elements of Claim 1 are met by various cited paragraphs in Blagg. However, the Applicants respectfully disagree and submit that none of the elements of Claim 1 are disclosed by Blagg. The Applicants will address the rejection on an element by element basis.

- Claim 1 contains the limitation of "...one or more master purchasing card accounts linked to a bank account...". The Examiner states that this element is met in ¶ 0055-0056, 0069 and 0072 regarding linking accounts and in ¶0062 indicating that the issuer is typically a financial institution or bank. The Applicants' reading of those paragraphs, in particular ¶0055-0056, 0069 and 0072 indicate that these paragraphs teach the grouping of cards together into groups, not linking master purchasing card accounts to a specific bank account. Although each individual card in both the Blagg reference and the present invention have their own accounts, there is no mention of the cards in Blagg being linked to a bank account different from the account present for each individual card. Instead, the cards in Blagg are form together into a group of cards. With respect to the issuer typically being a financial institution or bank as indicated in ¶0062, the Applicants respectfully submit that it is not relevant because the issuer of each individual card being a financial institution or bank is not part of the Applicants' claim. It is common knowledge that issuers of credit cards are typically financial

institutions or banks. However, no financial institution or bank currently allows the linking of an individual credit card account to a bank account. For these reasons, the Applicants respectfully submit that this element of Claim 1 and its dependent claims has not been met.

- “...one or more subordinate purchasing card accounts linked to one of said master purchasing card accounts or to other subordinate purchasing card accounts linked directly or indirectly to one of said master purchasing card accounts...” The Examiner states that this is disclosed in ¶0071-0075 and 0090-0094. However, the Applicants respectfully submit that these paragraphs do not disclose linking accounts to each other but instead disclose linking accounts into a group. The grouping of accounts in Blagg is accomplished by linking a financial record that corresponds to each account to group master data record for the group. Therefore, cards are not linked to individual other cards or to a bank account, but are instead linked together in a group by virtue of the tying of their financial record to a group master data record. *See* ¶0072, lines 1-3. The present invention, on the other hand, allows the linking a card account to other accounts, which may be master accounts (i.e., linked directly to the master bank account) or which may be other subordinate accounts. This is not disclosed by Blagg, and for this reason, the Applicants respectfully submit that this element is also not taught by the cited reference.
- “...wherein the owner of said bank account may authorize a transfer of funds to any master purchasing card account to cover purchases made using that master purchasing card account or to any subordinate purchasing card account linked to that master purchasing card account...” The Examiner states that this element is

disclosed in ¶0075-0078, 0104 and 0126. ¶0075-0078 discuss liability for purchases made by various cardholders in the group (i.e., one cardholder can be individually or jointly liable for purchases made on another card). ¶0075-0078 do not disclose the transferring of funds between cards or between a bank account and cards which are linked to that bank account. Further, ¶0104 discusses combining accounts, which the Applicants respectfully submits is not relevant because that feature is not part of the claim. In ¶0126, the cited reference discusses changing the primary owner of a group which also has no relevance here because the claim does not contain an element specifying changing the owner of the group. As a result, The Applicants respectfully submit that the transferring of funds between cards is not disclosed by the cited portions of Blagg, and for this additional reason, the rejection has been traversed.

- “...wherein the owner of any of said purchasing card accounts may authorize the movement of funds from its own account to any subordinate purchasing card account having a link thereto..” The Examiner states that this is disclosed in ¶-¶0134-0142, which discusses authorizing transactions, and in ¶0143-0154 which discusses the application of payments. ¶0134-0142 disclose authorizing a transaction (i.e., authorizing the payment of a merchant at the time a purchase is made by a cardholder.) This is not what is being claimed in this element. This element of the claim states that owners of purchasing card accounts can authorize the transfer of funds from its own account to subordinate accounts which are linked thereto. This has nothing to do with authorizing payment of the merchant at the time of the purchase by individual cardholders. Likewise, ¶0143-0154 discuss the applying of a payment which is received from a cardholder, and, in

particular, now a payment received from one cardholder in a group can be applied across the group in a variety of different ways. However, in the present application, and in particular, as specified by this element and the previous element, funds to cover purchases made by any card originate at the bank account and flow down from the bank account to master purchasing cards, and then to subordinate purchasing cards, etc. Nothing in this claim discusses how a payment received from a cardholder is applied to that individual cardholder's account or to any cardholder's account within the hierarchy. As a result, the Applicant respectfully submit that this element is also not disclosed by Blagg, and for this additional reason, the rejection of Claim 1 has been traversed.

As a result of the discussion above, the Applicants respectfully submit that none of the elements of Claim 1 are disclosed in the cited reference and respectfully submit that the Examiner reconsider the claim in light of these remarks and withdraw the rejection under § 102.

With respect to Claim 2, which is dependent upon Claim 1, Claim 2 contains all of the limitations of claim 1 and therefore the remarks with respect to Claim 1 apply to Claim 2 as well.

With respect to Claim 3, which contains all of the elements of Claim 1, and, in addition, includes the element that the purchasing cards may create and break links to or from subordinate purchasing cards, the Examiner states that this element is disclosed in ¶0080 and 0085. However, ¶0080 merely discusses that a record is maintained in a group member file even if an account is de-linked from the group. ¶0080 does not specify how cards become linked or de-linked from the group and in particular does not state that the

purchasing cardholders may create and break links to or from subordinate purchasing accounts. Likewise, ¶0085 discloses how a payment made to the group is to be applied across its various card members, and has no relevance with respect to the linking and de-linking of cards.

Claim 4 adds the limitations that the adjustment of the expenditure limit for any subordinate card can be accomplished in real time. The Examiner cites ¶036. However, ¶0136 discusses a group credit line which is shared among cards which are members of the group. The cited paragraph does not discuss the authorization of modifications to credit lines for individual card accounts.

Claim 5 contains a limitation that authorizations for modifications of the credit line are facilitated by a website available over the Internet, which the Examiner states is disclosed in ¶0059-0062. However, these paragraphs only discuss a general computer program and not how that computer program is applied to the invention disclosed in the cited reference. In addition, no mention is made of either a website or the Internet in the cited paragraphs.

With respect to Claims 7 and 8, which state that the system of Claim 2 further comprises a software application running on a computer system and, in Claim 8, where the software application establishes communications with outside entities. The Examiner cites ¶0058 and 0059 of the cited reference. However, these paragraphs in Blagg only discuss how a method or process is generally embodied in a sequence of computer steps. Nothing in these paragraphs apply a software application to the processing of credit cards in the manner described in Claim 2, nor does it mention that the software application executing this method may establish communications with outside entities.

With respect to Claim 9, which adds the limitation that communication with outside entities are encrypted prior to sending and decrypted after receiving to ensure data integrity, the Examiner cites Figure 7B, reference numbers 754-760 regarding authorization and approval. However, this portion of Figure 7B pertains to whether individual requests for transactions for purchase are to be authorized or not authorized. No reference to encrypting and decrypting for purposes of securing communications with outside entities is mentioned in Figure 7B or in the accompanying text.

With respect to Claim 11, which adds the limitation that the software application establishes communication with the bank which maintains the claimed bank account to which the master purchasing cards are linked, the Examiner states that this is disclosed in ¶0062-0063. However, these paragraphs discuss only that banks or other financial institutions are typically the issuers of the various credit card products, which is well known in the art. These paragraphs do not disclose that the software application which is part of the claimed invention establish communications with the bank at which the bank account is being maintained.

Claim 12 adds the limitation that the software application be able to initiate a transaction to move funds between a bank account and the purchasing card accounts to cover expenditures made using the purchasing card accounts, the Examiner states that this is disclosed in ¶0016, 0035, 0104 and 0126. First, as previously stated, the cited reference does not disclose having purchasing cards linked to a master bank account from which funds can be transferred to cover purchases. In addition, ¶0016 discusses recordkeeping with respect to purchases made using cards which are members of the group as well as how spending limits for each individual card is maintained; ¶0035 discloses a group credit line and the transfer of *balances* between accounts, not the

transfer of *funds* between accounts to cover purchases already made with each individual account; ¶0104 and 0126 disclose things which are not claimed in any of the claims of this application, as discussed previously. ¶0104 discloses combining accounts and ¶0126 disclosed changing the primary owner of a group.

Claim 13 adds the limitation that the software application be able to establish communications with the credit card processor, which the Examiner states is disclosed in ¶0058. However, ¶0058 only discusses a computer program in general and not this element of this claim.

Claim 14 adds the limitation that the software application be able to instruct the credit card processor to modify an expenditure limit for any of the purchasing cards. The Examiner states that this is disclosed in ¶0062, 0121, 0136, 0153 and 0181. ¶0062 discusses a typical prior art processing of a credit card transaction; ¶0121 discloses modifying the relationship between the dependent count and the group to which it belongs; ¶0136 discloses how transactions are authorized for purchases made by credit cards within the group; ¶0153 discusses the application of payments received from users to their own account or to other cards which are members of the group; and. ¶0181 discloses redeeming reward points as a member of the group. None of these paragraphs disclose the software application instructing a credit card processor to modify an expenditure limit for any of the purchasing cards.

Claim 15 includes the limitation that the credit card processor and the software application exchange data, wherein the software application receives data advising of the purchases made by the purchasing cards. The Examiner states that this is disclosed in ¶0129-0131. However, these paragraphs discuss how dependent accounts are added into the group and not how data is exchanged between the software application and a credit

card processor. In fact, a credit card processor is not even mentioned in these paragraphs, nor is data regarding purchases made by dependent cards.

As a result of the above discussions, the Applicants respectfully submit that none of the limitations disclosed in Claims 1-15 are taught by the cited reference and respectfully request reconsideration of those claims.

The Examiner has rejected Claims 6, 24 and 28 under 35 U.S.C. § 103(a) as being unpatentable over Blagg in view of U.S. Patent No. 6,581,035 (Madan, et al., hereinafter "Madan"). The Examiner states that all elements of the claim are disclosed by Blagg except the use of voice recognition software to accomplish the transactions, which he states are disclosed in Madan in the Abstract, and in Figure 2 and the associated text.

With respect to Claim 6, the Applicants acknowledge that identification of users via voice recognition is well known in the prior art. However, there is no motivation to apply the teachings of Madan to the present invention. Madan involves the sending of messages through the translation of voices and has no application to financial transactions. Therefore, the Applicants respectfully submit that the combination of these two references is not proper. Furthermore, Claim 6 must be read in the context of its parent claim, (Claim 4) to read that the voice recognition facility facilitates requests for modifications of a maximum transfer amount for any subordinate account. The combination of the two references does not suggest or disclose utilizing a voice recognition facility to facilitate modifying a maximum transfer amount between credit cards which are linked together.

The Examiner states that Claims 16-27, 29 and 30 are directed to a system and method as described above and are similarly rejected. Claims 16-27, 29 and 30 contain

limitations similar to Claims 1-15, and therefore the same comments as presented above with respect to those claims apply to these claims as well.

Conclusion

The Applicants respectfully submit that reasoned arguments have been made rebutting the Examiner's rejections of all the claims of the application and that differences between the cited references in the invention as claimed have been particularly pointed out. As a result, the Applicants request reconsideration of all currently pending claims and withdrawal of the rejections under § 102(e) and 103(a) and the issuance of a Notice of Allowance of all currently pending claims at the earliest possible time.

It is believed that this Response requires no fee. However, if a fee is required for any reason, the Commissioner is hereby authorized to charge Deposit Account No. 02-4553 the necessary amount.

Respectfully submitted,



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Dennis M. Carleton
Reg. No. 40,938
Attorney for the Applicants
Buchanan Ingersoll
One Oxford Centre, 20th Floor
Pittsburgh, PA 15219
Voice: 412-562-1895
Fax: 412-562-1041
E-mail: **carletondm@bipc.com**